



THE STATE  
of **ALASKA**  
GOVERNOR SEAN PARNELL

**Department of Environmental  
Conservation**

**DIVISION OF AIR QUALITY  
AIR PERMITS PROGRAM**

410 Willoughby Ave., Suite 303  
P. O. Box 111800  
Juneau AK 99811-1800  
Main: 907.465.5100  
Fax: 907.465.5129  
<http://dec.alaska.gov/air/index.htm>

February 25, 2014

Laurie Kral  
U.S. EPA Region 10  
1200 Sixth Avenue, MS OAQ-107  
Seattle, WA 98101

Subject: Resubmittal of Proposed Renewal Operating Permit No. AQ0267TVP02 for ConocoPhillips Alaska Inc. (CPAI) Kuparuk Central Production Facility No.1 (K-CPF-1), File # 300.16.406

Dear Ms. Kral:

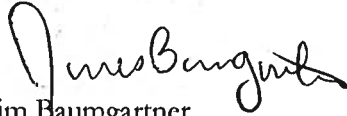
The Department originally submitted the proposed renewal permit No. AQ0267TVP02 for K CPF-1 to EPA Region X on October 11, 2013. On November 1, 2013, the Department withdrew this submission to make additional changes as the result of on-going ex-parte' discussion with the North Slope producers affected by the original EPA PSD BACT emission limits from the early 1980s. In accordance with AS 46.14.220, the Department is now resubmitting a copy of the proposed operating permit that we intend to issue with its statement of basis. The proposed permit addresses comments received on the preliminary decision and public comment draft permit.

K-CPF-1 processes crude oil production fluids received from various crude oil accumulations located in the Kuparuk River Unit on the North Slope of Alaska, including (but not limited to) Drill Sites 1A, 1B, 1C, 1D, 1E, 1F, 1G, 1J, 1L, 1Q, 1R, and 1Y.

The Department requests that EPA specifically consider the incorporation of footnotes to Table C and D, as well as the whole of Conditions 17 and 18 as pertains to the incorporation of the original prevention of significant deterioration permitting actions made by EPA in the 1990's. Specifically, BP (Alaska) Exploration and ConocoPhillips asserted that the short-term federal BACT emission limits apply only at full load based on footnotes listed in the Department's previous construction/operating permit (No. AQ0267TVP02).

I would appreciate your prompt review so we can issue this permit as soon as possible. Please call me at (907) 465-5108, or Jim Plosay at (907) 465-5561 or email him at [jim.plosay@alaska.gov](mailto:jim.plosay@alaska.gov) if you have questions.

Sincerely,



Jim Baumgartner  
Compliance Section Manager

Enclosures: Proposed Renewal Operating Permit No. AQ0267TVP02  
Statement of Basis  
EPA Final Checklist  
Response to Comments

cc: P. Moses Coss, ADEC/APP, Fairbanks  
John Kuterbach, ADEC/APP, Juneau  
James Plosay, ADEC/APP, Juneau  
Jeremy Ptak, ADEC/APP Anchorage  
Robin Wagner, ADEC/APP, Fairbanks  
Brad Thomas, CPAI, Anchorage  
Sims Duggins, SLR International, ([seduggins@slrconsulting.com](mailto:seduggins@slrconsulting.com))